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Attorneys for Defendants PARAMOUNT
PICTURES CORPORATION, SONY
PICTURES ENTERTAINMENT INC.,
and VIACOM INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

DAVID L. WHITEHEAD,

Plaintiff,

v.

MILLENNIUM FILMS; VERIZON
INC.; PARAMOUNT PICTURES;
VIACOM; 20TH CENTURY FOX
FILM; OPRAH WINFREY; TOM
CRUISE; PAULA WAGNER; DAN
SNYDER; JP MORGAN; COMCAST
INC.; SONY; MOONBOT STUDIOS;
CHIPOTLE MEXICAN GRILL;
APPLE INC.; SHEILA C. JOHNSON;
HARVEY WEINSTEIN; THE
WEINSTEIN COMPANY; COLONEL
J. GEORGE & S. SALOOM HANNIE
COMMUNITY HOME, INC. and
UNKNOWN OFFICERS;
SOCKRIDER, BOLIN, ANGLIN &
BATTE PLC; and UNKNOWN DOES
1-50,

Defendants.

Case No. 15-CV-3564 RGK (AGRx)

**DEFENDANTS PARAMOUNT
PICTURES CORPORATION, SONY
PICTURES ENTERTAINMENT
INC., AND VIACOM INC.'S
OPPOSITION TO PLAINTIFF
DAVID L. WHITEHEAD'S
EMERGENCY NOTICE
PLEADING ON PLAINTIFF'S
JOINT SCHEDULING
CONFERENCE STATEMENT AND
RULE 26(F) REPORT**

Date: March 28, 2016
Time: 9:00 a.m.

The Honorable R. Gary Klausner

1 Plaintiff David L. Whitehead (“Plaintiff”) has filed a motion, styled as
2 Plaintiff’s Emergency Notice Pleading on Plaintiff’s Joint Scheduling Conference
3 Statement and Rule 26(F) Report, in which Plaintiff requests that Defendants
4 Paramount Pictures Corporation (“Paramount”), Sony Pictures Entertainment Inc.
5 (“SPE”), and Viacom Inc. (“Viacom”) (collectively, “Defendants”) be sanctioned
6 “[i]f [defense counsel] did not attach plaintiff’s” joint scheduling conference
7 statement to Defendants’ joint scheduling conference statement. *See* Dkt. No. 120
8 at 4 (“Emergency Notice”). Plaintiff’s statement was attached as Exhibit A to
9 Defendants’ statement and was filed along with Defendants’ statement. *See* Dkt.
10 No. 115. Accordingly, Plaintiff’s request for sanctions should be denied.

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12 DATED: March 7, 2016

CALDWELL LESLIE & PROCTOR, PC
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CAMERON J. JOHNSON

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16 By _____/s/

17 LINDA M. BURROW
18 Attorneys for Defendants PARAMOUNT
19 PICTURES CORPORATION, SONY
20 PICTURES ENTERTAINMENT INC., and
21 VIACOM INC.
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